

Paul T. Trimmer
Nevada State Bar No. 9291
Eric Magnus (*admitted Pro Hac Vice*)
Georgia Bar No. 801405
Daniel I. Aquino
Nevada State Bar No. 12682
JACKSON LEWIS P.C.
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Tel: (702) 921-2460
Fax: (702) 921-2461
Email: paul.trimmer@jacksonlewis.com
Email: daniel.aquino@jacksonlewis.com

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LISA DANIELS,

Plaintiff,

vs.

ARIA RESORT & CASINO, LLC; DOES I
through V, inclusive; and ROE
CORPORATIONS I through V, inclusive

Defendants.

Case No.: 2: 20-cv-00453-GMN-DJA

**STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF STAY
PENDING MEDIATION**

(SECOND REQUEST)

Defendant Aria Resort & Casino, LLC, (“Defendant” or “Aria”), by and through its counsel, Jackson Lewis P.C., and Plaintiff Lisa Daniels (“Plaintiff”), by and through her counsel, Claggett & Sykes Law Firm, hereby stipulate and request that the stay of this action and all related deadlines be extended pending the outcome of the currently-scheduled mediation.

On December 23, 2020, the Court granted the parties’ request to stay this action in its entirety while the parties scheduled a mediation in this matter. ECF No. 29. The parties subsequently scheduled a mediation of the matter to occur on April 8, 2018 before Hon. Philip M. Pro (Ret.) at JAMS, and the Court granted the parties’ request to extend the stay of the action until April 15, 2021. ECF No. 31.

The parties have engaged in informal discovery to allow each side to prepare for the mediation, including provision of relevant information and records. In the course of preparing for

the mediation, the parties identified a factual dispute crucial to determining whether a group of employees is appropriately included in the proposed FLSA collective. The parties agree that this factual dispute must be resolved prior to mediation in order to engage in fruitful settlement discussions. The parties believe this factual dispute can be resolved quickly with additional investigation, and thus have agreed to a brief continuance of the mediation. The next date on which all parties and the mediator are available is June 10, 2021, and the parties have scheduled the mediation for that date.

The parties accordingly stipulate and request that this matter be stayed in its entirety until June 17, 2021, one week following the mediation. On or before June 17, 2021, the parties will submit a joint status report to the Court indicating the result of the mediation and either proposing a discovery plan and scheduling order or a schedule for approval of the settlement.

This is the parties' second request for extension of the stay in this matter and is made in good faith and not for the purpose of delay. As a trial date has not yet been set in this case, the trial will not be postponed due to the requested stay.

Based on the foregoing, the parties respectfully request that the Court enter an order granting the parties' requested relief.

Dated this 1st day of April, 2021.

CLAGGETT & SYKES LAW FIRM

JACKSON LEWIS P.C.

/s/ Joseph N. Mott

/s/ Daniel I. Aquino

Sean K. Claggett, Esq., Nevada Bar No. 8407
Joseph N. Mott, Esq., Nevada Bar No. 12455
4101 Meadows Lane, Suite 100
Las Vegas, Nevada 89107

Paul T. Trimmer, Nevada State Bar No. 9291
Eric Magnus (admitted Pro Hac Vice)
Daniel I. Aquino, Nevada State Bar No. 12682
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101

Attorneys for Plaintiff

Attorneys for Defendant

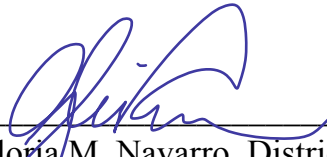
ORDER

IT IS HEREBY ORDERED this matter is stayed in its entirety until June 17, 2021.

IT IS FURTHER ORDERED the parties will submit to the Court a joint status report on or before June 17, 2021. The status report will include the results of the parties' mediation efforts

1 and propose a schedule for the case to proceed either with discovery or the settlement approval
2 process.

3
4 Dated this 6 day of April, 2021.

5
6 
7 _____
8 Gloria M. Navarro, District Judge
9 United States District Court
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28